

ATTACHMENT 1
RESPONSE TO ITEM D OF ABCN-W375-00-00049, Rev. 0

D. Perform a written evaluation that demonstrates that the revision to the AB:

1. Will continue to comply with all applicable laws and regulations, conform to top-level safety standards, and provide adequate safety.

A revision to the Radiation Protection Program (RPP) for Design is required because construction activities are outside the current scope of the current program. As required by 10 CFR 835.101(g)(2), an update of the RPP is necessary to incorporate plans and measures appropriate for assuring radiological safety during WTP construction activities. These additional plans and measures are designed to minimize potential exposure to radioactive material and assure worker, public, and environmental protection. The revised document will continue to comply with all applicable 10 CFR 835 requirements, while conforming to top-level safety standards and providing adequate safety during WTP design and construction activities.

The proposed changes to the implementing standards associated with various SRD Vol. II Safety Criterion do not alter the wording of the affected Safety Criterion; therefore, CHG maintains its commitment to comply with the SRD Safety Criterion as stated. The replacement of superceded DOE Implementation Guides with their current version ensures compliance with existing federal regulations, implementation of an adequate radiological safety program, and conformance to the top-level radiological safety standards from DOE/RL-96-0006.

2. Will continue to conform to the original submittal requirements associated with the authorization basis document(s) affected by the revision.

The proposed RPP for Design and Construction continues to conform to its original submittal requirement to describe the plans and measures necessary to comply with 10 CFR 835, Occupational Radiation Protection, during all phases of the RPP-WTP Project.

The proposed change conforms to the original SRD submittal requirements to identify appropriate Implementing Codes and Standards designed to ensure each associated Safety Criterion is satisfied. The change will ensure the most current DOE implementation guidance is consulted when crafting Radiation Protection Program elements, thereby ensuring compliance to 10 CFR 835.

3. Will not result in inconsistencies with other commitments and descriptions contained in the authorization basis or an authorization agreement.

The proposed RPP for Design and Construction references the current DOE Implementation Guides that are compliant with 10 CFR 835, Occupational Radiation Protection. However, the DOE Implementation Guides referenced in the SRD have been superceded and conflict with the current 10 CFR 835. The proposed change will resolve this inconsistency between the proposed RPP for Design and Construction and the SRD. This change does not affect the requirements established in any other AB documents.